

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MARIA MAURO,

Plaintiffs,

- against -

COUNTRYWIDE HOME LOANS, INC.,
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., PETER J. DAWSON, BMG
ADVISORY SERVICES, LTD., VICTORIA S.
KAPLAN AND VICTORIA S. KAPLAN, P.C.,

Defendants.

Case No.: 07 CV 1268 (JFB)(WDW)

**JOINT STIPULATION FOR
ORDER EXTENDING
DISCOVERY AND RELATED
DATES**

WHEREAS the Court entered a Scheduling Order dated July 21, 2009 that, inter alia, set August 14, 2009 as the date for completion of discovery, set August 28, 2009 as plaintiff's deadline for serving an expert report, set September 25, 2009 as defendants' deadline for serving expert reports, set October 16, 2009 as the deadline to complete depositions of experts, and set November 13, 2009 as the date for filing dispositive motions in the action (the "Dispositive Motion Date");

IT IS HEREBY STIPULATED AND AGREED, AS FOLLOWS:

1. The Discovery Deadline is extended to and including November 16, 2009.
2. Expert discovery as follows: Plaintiff expert report by November 30, 2009, defendant expert reports, if any, by December 21, 2009 and depositions of all experts to be completed by January 18, 2010.

3. The date to serve Dispositive Motions is extended to and including February 12, 2010.

Dated: October 1, 2009

SCOTT A. ROSENBERG, P.C.

ZEICHNER ELLMAN & KRAUSE LLP

By: /s/ Kevin R. Toole
Kevin R. Toole (KT-7700)
Of Counsel
Attorneys for Plaintiff
Maria Mauro
265 Post Avenue, Suite 120
Westbury, New York 11590
(516) 877-7205

By: /s/ Steven S. Rand
Steven S. Rand (SR-6720)
Partner
Attorney for Defendant
Countrywide Home Loans, Inc.
575 Lexington Avenue
New York, New York 10022
(212) 223-0400

L'ABBATE, BALKAN, COLAVITA &
CONTINI, L.L.P.

By: /s/ Scott E. Kossove
Scott E. Kossove (SK-9812)
Attorneys for Defendants Victoria S.
Kaplan and Victoria S. Kaplan, P.C.
1001 Franklin Avenue
Garden City, NY 11530
(516) 294-8844

Dated: Central Islip, New York
October ____, 2009

U.S.M.J.